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Attorney for Defendant
ROBERT CRIST

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,)	Case No. 2:22-cr-00229-TLN-1
)	
Plaintiff,)	
)	STIPULATION AND ORDER TO CONTINUE
vs.)	STATUS CONFERENCE
)	
ROBERT CRIST,)	
)	Date: March 2, 2023
)	Time: 9:30 a.m.
Defendant.)	Court: Hon. Troy L. Nunley

IT IS HEREBY STIPULATED by and between Phillip A. Talbert, United States Attorney, through Assistant United States Attorney Emily Sauvageau, attorney for Plaintiff and Federal Defender Heather E. Williams through Assistant Federal Defender Hannah Labaree, attorney for Robert Crist, that the status conference, currently scheduled for March 2, 2023, be continued to May 4, 2023 at 9:30 a.m.

To date, the government has produced approximately 228 Bates-stamped items in discovery. As of the date of this filing, the government has indicated to the defense that additional discovery is about to be produced. Defense counsel requires additional time to review the discovery, meet with her client, and conduct independent investigation. The parties thus request a T4 exclusion of time until May 4, 2023.

Based upon the foregoing, the parties agree time under the Speedy Trial Act should be excluded from this order's date through and including May 4, 2023; pursuant to 18 U.S.C. §3161

(h)(7)(A) and (B)(iv)[reasonable time to prepare] and General Order 479, Local Code T4 based upon continuity of counsel and defense preparation.

Dated: February 23, 2023

HEATHER E. WILLIAMS
Federal Defender

/s/ Hannah Labaree
HANNAH LABAREE
Assistant Federal Defender
Attorney for Defendant
ROBERT CRIST

Dated: February 23, 2023

PHILLIP A. TALBERT
United States Attorney

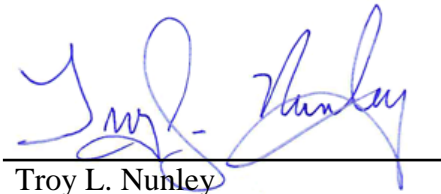
/s/ Emily Sauvageau
EMILY SAUVAGEAU
Assistant U.S. Attorney
Attorney for Plaintiff

ORDER

IT IS HEREBY ORDERED, the Court, having received, read, and considered the parties' stipulation, and good cause appearing therefore, adopts the parties' stipulation in its entirety as its order. The Court specifically finds the failure to grant a continuance in this case would deny counsel reasonable time necessary for effective preparation, taking into account the exercise of due diligence. The Court finds the ends of justice are served by granting the requested continuance and outweigh the best interests of the public and defendant in a speedy trial.

The Court orders the time from the date the parties stipulated, up to and including May 4, 2023, shall be excluded from computation of time within which the trial of this case must be commenced under the Speedy Trial Act, pursuant to 18 U.S.C. § 3161(h)(7)(A) and (B)(iv) [reasonable time for counsel to prepare] and General Order 479, (Local Code T4). It is further ordered the March 2, 2023 status conference shall be continued until May 4, 2023, at 9:30 a.m.

Dated: February 23, 2023


Troy L. Nunley
United States District Judge